

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs and
Counterdefendants,

C.A. No. 20-613 (SB)

V.

ROSS INTELLIGENCE INC.,

Defendant and
Counterclaimant.

REDACTED - PUBLIC VERSION

Original filing date: November 13, 2024

Redacted filing date: November 18, 2024

**DECLARATION OF MIRANDA D. MEANS IN SUPPORT OF PLAINTIFFS’
REPLY BRIEF IN SUPPORT OF THEIR RENEWED MOTION FOR PARTIAL
SUMMARY JUDGMENT ON FAIR USE**

I, Miranda D. Means, Esq., declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, counsel of record for Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively, “Plaintiffs”). I am admitted and in good standing to practice law in the states of Massachusetts and New York, and I am admitted *pro hac vice* to practice in this District for the above-captioned case. I submit this declaration in support of Plaintiffs’ Reply in Support of Their Renewed Motion for Partial Summary Judgment on Fair Use. The statements set forth in this declaration are based on my personal knowledge and my review of the contemporaneous documents referenced and attached hereto.

2. Attached hereto as **Exhibit 139** is a true and correct copy of excerpts from the deposition of Erik Lindberg, taken March 22, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 13th day of November, 2024.

/s/ Miranda D. Means

Miranda D. Means

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 13, 2024, upon the following in the manner indicated:

David E. Moore, Esquire
Bindu Palapura, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Mark A. Klapow, Esquire
Lisa Kimmel, Esquire
Crinesha B. Berry, Esquire
Matthew J. McBurney, Esquire
Keith J. Harrison, Esquire
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Jacob Canter, Esquire
Warrington Parker, Esquire
Anna Z. Saber, Esquire
Beatrice B. Nguyen, Esquire
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Emily T. Kuwahara, Esquire
Jordan Ludwig, Esquire
CROWELL & MORING LLP
515 South Flower Street, 41st Floor
Los Angeles, CA 90071
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Ryan Henry Seewald, Esquire
CROWELL & MORING LLP
1601 Wewatta Street, Suite 815
Denver, CO 80202
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

/s/ Michael J. Flynn

Michael J. Flynn (#5333)